



# Knuckles Komosinski & Manfro LLP

600 E. Crescent Ave., Suite 201 | Upper Saddle River, New Jersey 07458  
Tel (201) 391-0370 | eFax (201) 781-6744 | [www.kkmlp.com](http://www.kkmlp.com)

## Partners

Mark R. Knuckles  
Richard F. Komosinski  
Jordan J. Manfro  
John E. Brigandi

**John E. Brigandi**  
(201) 391-0370, ext. 401  
[jeb@kkmlp.com](mailto:jeb@kkmlp.com)

January 13, 2021

### Via ECF

Hon. Vincent L. Briccetti, U.S.D.J.  
The Hon. Charles L. Brieant Jr.  
Federal Building and U.S. Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Re: Kuhl v. Rushmore, et al.  
Case No. 19-cv-8403

Dear Judge Briccetti,

This office represents defendants Rushmore Loan Management Services, LLC, and U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee for Legacy Mortgage Asset Trust 2018GS-1 (collectively, "Defendants") in the above-referenced action. Defendants respectfully submit this correspondence seeking a thirty-day extension of the fact discovery deadline from January 30, 2021, until March 1, 2021.

Pursuant to Your Honor's October 29, 2020, Order, Defendants timely served plaintiff Jonathan Kuhl ("Plaintiff") with their first set of interrogatories and first requests for production of documents, on November 3, 2020. To date, Plaintiff has not provided responses. Following several email exchanges concerning the outstanding discovery, the parties conducted a meet and confer telephone conference on January 13, 2021. During said conference, Plaintiff agreed to respond to Defendants' discovery demands, via regular mail, by January 18, 2021. While I anticipate that Plaintiff will provide fully responsive discovery responses, Defendants will need time to review the document production and responses to discovery to determine whether any issues remain, or whether to conduct depositions.

For these reasons, Defendants respectfully request that the fact discovery deadline set forth in Your Honor's October 29, 2020, Order be extended until March 1, 2021. Defendants do not anticipate that any additional deadlines need to be extended at this time.

I have conferred via telephone with Plaintiff, and confirmed via email, that Plaintiff consents to the instant request to extend the fact discovery deadline.

Respectfully Submitted,

/s/ John E. Brigandi  
John E. Brigandi

cc: Jonathan Kuhl (via email)